

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
	:	Case No. 24-11967 (JKS)
BIG LOTS, INC., <u>et al.</u>	:	
Debtors. <sup>1</sup>	:	

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**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS  
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE, that the undersigned attorneys hereby appear as counsel for Maureen Scullon (“**Scullon**”), potentially a creditor in the above-captioned cases and hereby requests, pursuant to Federal Rules of Bankruptcy Procedure 2002 and 9007, and sections 342 and 1109(b) of the Bankruptcy Code, that all copies and pleadings given or filed in this case be given and served upon counsel at the following addresses and telephone numbers:

**Deirdre M. Richards, Esquire**  
**ELLIOTT GREENLEAF, P.C.**  
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**Wilmington, DE 19801**  
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PLEASE TAKE FURTHER NOTICE that this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, e-mail, hand delivery, telephone, telegraph, facsimile, telex, or otherwise: (1) that affects or seeks to affect

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<sup>1</sup> The debtors are debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores -PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

in any way any rights or interest of any creditor or any party-in-interest in this case, including **Scullon** with respect to (a) the debtor; (b) property of the estate or proceeds thereof, in which the debtor may claim in interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or conduct by the delivery of any property, payment, or other conduct by **Scullon**.

PLEASE TAKE FURTHER NOTICE that **Scullon** intends that neither this Entry of Appearance nor any later appearance, claim, or other pleadings shall waive (1) **Scullon's** right to have final Orders in non-core matters entered only after *de novo* review by the United States District Court; (2) **Scullon's** right to trial by jury in any proceeding related to this case; (3) **Scullon's** right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any rights, claims, actions, defenses, set-offs or recruitments to which **Scullon** is or may be entitled to under agreement, in law or at equity, all of which rights, claims, actions, defenses, set-off or recruitments **Scullon** hereby expressly reserves.

**ELLIOTT GREENLEAF, P.C.**

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*Attorneys for Maureen Scullon*

Dated: November 27, 2024